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GUSTAVE H. NEWMAN (1927-2017)

—
WILLIAM J. DOBIE

MEMO ENDORSED

April 1, 2020

BY ECF

Hon. Kenneth M. Karas
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Re: *United States v. Goldbrener, et al.*, 18-Cr-614 (KMK)
**(Defendant Schwartz's Unopposed Request for A) An
Extension to File Objections to the PSR, and
B) An Adjournment of His Current Sentencing Date)**


Dear Judge Karas:

I represent Moshe Schwartz, one of the defendants in the above-entitled matter. I am writing, without government opposition, to request a one-month extension of Mr. Schwartz's time to file his objections to the Probation Department's preliminary Pre-Sentencing Report ("PSR") --- from April 11 to May 11, 2020 --- which takes into account the eight-day Jewish holiday of Passover, a holiday both Mr. Schwartz and I observe. Mr. Schwartz has tested positive for Covid-19, his wife is experiencing similar symptoms and, although I have not been tested, I and others in my household have experienced symptoms consistent with the virus. In addition, for the past two weeks, I have been working from home and do not have access to all of the case documents. All of the foregoing prevents me from carefully reviewing and responding to the PSR with objections and corrections, which I believe will be serious and meritorious.

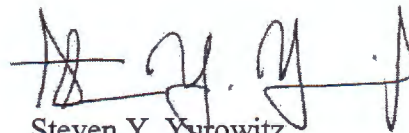
Moreover, since Mr. Schwartz's sentencing is now scheduled for June 12, 2020, counsel will require an adjournment of the sentencing date if counsel is to be able to prepare a professionally competent and effective sentencing memorandum.

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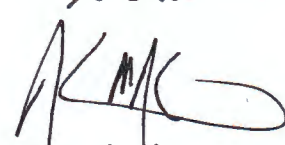
As a result, I am writing to request an adjournment of the current sentencing date either *sine die* (a practice that at least one other district court that I know of has followed in light of the Covid-19 pandemic) or to a date sometime in September 2020. The requested extension will permit the defendant, counsel and the Court to regain their bearings after the current pandemic subsides. I have communicated with AUSA Michael Maimin, and I am authorized to represent that the government has no objection to the foregoing requests. 

Respectfully submitted,


Steven Y. Yurowitz

cc: All government counsel (by ECF)
All defense counsel (by ECF)
USPO Deanna Paige (by email)

Granted.
Sentence is adjourned to 7/15/20, 9/-
2:00

So Ordered.

4/3/20